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Attorneys for Plaintiff

SUSTAINABLE MODULAR MANAGEMENT, INC.

UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

UNITED STATES OF AMERICA, for the use and)	Case No. 2:20-cv-00790-GMN-NJK
benefit of SUSTAINABLE MODULAR)	
MANAGEMENT, INC., a Texas corporation)	STIPULATION TO EXTEND BY ONE
<i>Plaintiff,</i>)	WEEK THE DEADLINE FOR
v.)	RESPONDING TO THE RESPECTIVE
)	MOTIONS FOR PARTIAL-
JE DUNN CONSTRUCTION COMPANY, <i>et al.</i> ,)	SUMMARY JUDGMENT FILED BY
<i>Defendants.</i>)	PLAINTIFFS AND DEFENDANTS
)	(FIRST REQUEST)

Plaintiff, UNITED STATES OF AMERICA, for the use and benefit of Sustainable Modular Management, Inc. ("SMM" or "Plaintiff"), Defendant/Counterclaimant, JE Dunn Construction Company, and Defendants, Federal Insurance Company, Hartford Fire Insurance Company, Travelers Casualty and Surety Company of America ("Defendants") file this Stipulation to Extend By One Week the Deadline to Respond to their Respective Motions for Partial Summary Judgment, and in support thereof, respectfully state as follows:

RECITALS

1
2 1. The Court's Order extending the deadlines in the Discovery Plan and
3 Scheduling Order [Dkt. 95] and Local Rules reset the deadline for the parties to file
4 dispositive motions to June 30, 2023.

5 2. Consistent with the Court's Order and Local Rules,
6 Defendants/Counterclaimant and Plaintiff filed their respective Motions for Partial
7 Summary Judgment on June 30, 2023 [Dkt. 103] and [Dkt. 106], respectively, (collectively,
8 the "MPSJs").

9 3. July 21, 2023 is the current deadline for the parties to file their responses to
10 the MPSJs consistent with LR 7-2 of the Local Rules for the United States District Court,
11 District of Nevada and Rule 56 of the Federal Rules of Civil Procedure.

12 4. This is the first stipulation for an extension of time presented by the parties
13 to respond to the MPSJs, and the request is for an extension of one week until and including
14 July 28, 2023.

15 5. The parties have been working diligently on their response briefs and request
16 this one-week extension based on the volume of information presented in the MPSJs and
17 the significance of the issues presented by the dispositive nature of the relief requested.
18 Additionally, SMM's counsel has a college fair and activities for the start of school for his
19 teenage daughter today (on July 20, 2023) and sports-related activities for his son tomorrow
20 (July 21, 2023), along with a heavy workload since June 30, 2023 that has included multiple
21 settlement conferences (including a mediation out of town), depositions, responding to and
22 serving written discovery, preparing appellate briefs, and preparing and finalize expert
23 reports in other cases. If this stipulation is granted, it will allow Plaintiff's counsel to
24 participate in the college fair and sports activities with his family.

25 6. Defendants' and Counterclaimant's counsel has a work-related conference
26 out of town today and tomorrow. July 20-21, 2023, along with a heavy workload in other
27 matters.
28

7. This stipulation is filed before the July 21, 2023 deadline consistent with Local Rule IA -6.1, and is further submitted in good faith and not intended to cause delay.

8. Consistent with Local Rule IA 6-2, SMM and JE Dunn respectfully request that the Court extend the time for to respond the MPSJs until and including July 28, 2023.

DATED this 20th day of July, 2023.

MORRIS LAW GROUP

By: /s/ Michael S. Alfred
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ORDER

IT IS SO ORDERED.


United States District Judge

DATED July 20, 2023

CERTIFICATE OF SERVICE

Fed. R. Civ. P. 5(b) and Section IV of District of Nevada Electronic Filing Procedures, I certify that I am an employee of VERISLAW, PLLC, and that the following document was served on all counsel of record via electronic service **STIPULATION TO EXTEND SUSTAINABLE MODULAR MANAGEMENT, INC.'S AND JE DUNN'S TIME TO RESPOND TO MOTIONS FOR PARTIAL SUMMARY JUDGMENT (FIRST REQUEST).**

Dated this 20th day of July, 2023.

By: /s/ Edye Buxbaum

An Employee of VerisLaw, PLLC